

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
SANDRIDGE MISSISSIPPIAN TRUST II,
TOM L. WARD, JAMES D. BENNETT,
MATTHEW K. GRUBB, RANDALL D.
COOLEY, JIM J. BREWER, EVERETT R.
DOBSON, WILLIAM A. GILLILAND,
DANIEL W. JORDAN, ROY T. OLIVER,
JR., JEFFREY S. SEROTA, D. DWIGHT
SCOTT, RAYMOND JAMES &
ASSOCIATES, INC., MORGAN
STANLEY & CO. LLC (F/K/A MORGAN
STANLEY & CO INC.), MERRILL
LYNCH, PIERCE, FENNER & SMITH,
INC., CITIGROUP GLOBAL MARKETS
INC., and RBC CAPITAL MARKETS,
LLC,

Defendants.

SANDRIDGE ENERGY, INC.,

Nominal Defendant.

Case No. 5:15-CV-00634-G

CLASS ACTION

**NOTICE OF MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND AWARD TO PLAINTIFFS**

PLEASE TAKE NOTICE that pursuant to the Court's Order preliminarily approving the Settlement (ECF No. 468), on October 6, 2022 at 2:00 p.m. before the Honorable Charles B. Goodwin, of the United States District Court for the Western District of Oklahoma, 200 N.W. 4th Street, Courtroom 103, Oklahoma City, Oklahoma 73102, Lead Plaintiffs the Duane & Virginia Lanier Trust, Ivan Nibur, Jase Luna, Matthew Willenbacher, and Reed Romine ("Plaintiffs"),¹ will move this Court for entry of an Order: (i) awarding attorneys' fees of one-third of the Settlement Amount, or \$4,647,500; (ii) reimbursing litigation expenses in the amount of \$1,518,890.74; and (iii) reimbursing Plaintiffs for their costs and expenses directly related to the representation of the Settlement Class in the total amount of \$58,750.

This motion is based on this Notice of Motion, the Memorandum of Law in support, the Declaration of Jonathan Horne, and all exhibits thereto, and all pleadings, records, and papers on file herein.

A proposed order will be submitted on reply.

¹ Unless otherwise indicated, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement ("Stipulation") (ECF No. 463).

Dated: August 12, 2022

/s/ Jonathan Horne

Jonathan Horne (Admitted *Pro Hac Vice*)
Phillip Kim (Admitted *Pro Hac Vice*)
Laurence M. Rosen (Admitted *Pro Hac Vice*)
THE ROSEN LAW FIRM, P.A
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: jhorne@rosenlegal.com
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com

Lead Counsel for Plaintiffs

Nicholas G. Farha, OBA #21170
FARHA LAW, PLLC
1900 NW Expressway, Suite 501
Oklahoma City, Oklahoma 73118
Telephone: (405) 471-2224
Facsimile: (405) 810-9901
Email: nick@farhalawfirm.com

Liaison Counsel for Plaintiffs

Joshua E. Fruchter (Admitted *Pro Hac Vice*)
WOHL & FRUCHTER, LLP
25 Robert Pitt Drive, Suite 209G
Monsey, NY 10952
Telephone: (845) 290-6818
Facsimile: (718) 504-3773
Email: jfruchter@wohlfruchter.com

Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2022, a true and correct copy of the foregoing **NOTICE OF MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND AWARD TO PLAINTIFFS** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Executed on August 12, 2022

/s/ Jonathan Horne

Jonathan Horne